

(TOL TO NTC OR WVR HRG.)
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2017 MAY 10 P 4: 44

ERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

RANJITH KEERIKKATTIL,

Plaintiff,

v.

DELOITTE LLP, et al.

Defendants.

Case No: 1:16-cv-827-CMH-MSN

PLAINTIFF'S MOTION FOR ISSUANCE OF SUBPOENAS AD TESTIFICANDUM

Plaintiff, Ranjith Keerikkattil, pursuant to Local Civil Rule 45(A) of this court hereby files this motion requesting the issuance of attached subpoenas compelling the witnesses to appear and testify at the Jury Trial in this matter scheduled for June 19, 2017. *See* ECF No. 84. Local Civil Rule 45(A) requires *pro se* parties to seek leave of court for the issuance of subpoenas. All of the witnesses for whom a subpoena *ad testificandum* is being requested are part of the Witness List filed by Plaintiff with the court. *See* ECF No. 86

Plaintiff requests that subpoenas *ad testificandum* be issued for the following individuals:

1. Stacy Sawin – Stacy Sawin is the individual whose false complaint led to Plaintiff's unlawful termination and was a former defendant in this case. Ms. Sawin has personal knowledge of the incidents that led to Plaintiff's unlawful termination from Deloitte. *See* Sawin Decl. (ECF No. 76-2).
2. Andrew Sawin – Andrew Sawin is Stacy Sawin's father who she contacted just before filing the complaint against Plaintiff with Deloitte. Mr. Sawin has personal knowledge of the incidents that led to Plaintiff's unlawful termination from Deloitte. This is

corroborated by text messages (ECF No. 73-1) and documents produced by Defendants (ECF No. 73-4 at 6.)

3. Kash Tajammul – Kash Tajammul is Stacy Sawin’s Counselor at Deloitte and is the individual to whom she filed the complaint against Plaintiff that eventual led to his termination. Mr. Tajammul has personal knowledge of the incidents that led to Plaintiff’s unlawful termination from Deloitte. *See* ECF No. 73-2.
4. Bheeshma Tumati – Bheeshma Tumati was both Plaintiff’s and Ms. Sawin’s Manger at Deloitte. Mr. Tumati has extensive personal knowledge of the incidents that led to Plaintiff’s unlawful termination from Deloitte. *See* ECF No. 73-7 at 4-8.
5. Ritesh Verma – Ritesh Verma is a Director with Deloitte Consulting LLP and was the individual who hired both Plaintiff and Ms. Sawin on the CMS FPS proposal effort. Mr. Verma has personal knowledge of the incidents that led to Plaintiff’s unlawful termination from Deloitte. *See* ECF No. 73-7 at 1-3.
6. Laura Amster – Laura Amster was Plaintiff’s and Ms. Sawin’s colleague on the CMS FPS proposal effort and has personal knowledge of the incidents that led to Plaintiff’s unlawful termination from Deloitte. *See* ECF No. 73-7 at 9-12.
7. Julie Gi Kim - Julie Gi Kim was Plaintiff’s and Ms. Sawin’s colleague on the CMS FPS proposal effort and has personal knowledge of the incidents that led to Plaintiff’s unlawful termination from Deloitte. *See* ECF No. 73-7 at 13-14.
8. Aleta Jacobson – Aleta Jacobson is an eDiscovery Litigation Analyst with Deloitte who performed the forensic analysis of Stacy Sawin’s Deloitte corporate phone and laptop. Ms. Jacobson has personal knowledge of the text messages, e-mails, app data and IM’s recovered from Stacy Sawin Deloitte corporate devices. *See* ECF No. 73-6

9. Derick Masengale – Derick Masengale was at times relevant the head of Information Management Service Line within Deloitte Consultant LLP, the service line in which both Plaintiff and Ms. Sawin worked. Mr. Masengale was also the decision maker who terminated Plaintiff. *See* ECF No. 73-8

10. Vikram Rajan – Vikram Rajan is one of Stacy Sawin's boyfriends and is also her colleague at Deloitte. Ms. Sawin had multiple communications with Mr. Rajan about Plaintiff including text messages that were exchanged the day before she filed a complaint with Deloitte against Plaintiff. *See* ECF No. 73-1

For the foregoing reasons, Plaintiff Ranjith Keerikkattil respectfully requests that the court enter an order authorizing the issuance of the subpoenas attached with this motion.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 83.1M(2)

I declare under penalty of perjury that:

No other attorney has prepared, or assisted in the preparation of this document.




Ranjith Keerikkattil

Executed on: May 10, 2017

Dated: May 10, 2017

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of May 2017, Plaintiff's Motion for Issuance of Subpoenas *Ad Testificandum* was served by First Class Mail Postage Prepaid to:

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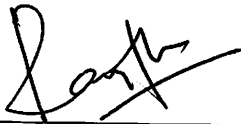
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Ranjith Keerikkattil